



James Verburg  
Regulatory Advisor  
US Biofuels Value Chain



**BP Products North America Inc.**  
30 South Wacker Drive  
Chicago, IL 60606

March 27, 2025

Stephanie Potts  
Senior Environmental Planner, Cap-and-Invest Program and Linkage  
Climate Pollution Reduction Program  
Washington Department of Ecology  
VIA e-mail  
[CCALinkage@ecy.wa.gov](mailto:CCALinkage@ecy.wa.gov)

**Re: Washington Cap-and-Invest: Linkage Agreement**

Dear Ms. Potts:

On behalf of BP Products North America Inc. (“bp”), thank you for the opportunity to provide comments on the September 23, 2024 joint statement from the California Air Resources Board (“CARB”), the Province of Québec, and the Washington Department of Ecology (“Ecology”) to pursue a potential linkage agreement.

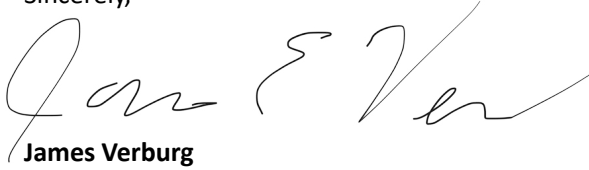
bp supports linked carbon markets and agrees with Ecology’s efforts to link Washington’s Cap-and-Invest Program with California and Québec’s linked carbon market. We believe linkage if done correctly, will enhance program effectiveness and stability, while fostering innovation, investment and economic competitiveness.

Washington’s Climate Commitment Act (CCA) made Washington a leader in climate change mitigation. The CCA’s market-based approach reduces greenhouse gas emissions effectively and equitably. Linking Washington’s Cap-and-Invest Program with California and Québec’s well-established carbon markets would create a larger carbon market with more participants and allowances and greater price stability of such allowances. Such price stability provides a key advantage for businesses planning long-term investments in cleaner technologies and helps Washington’s industries decarbonize efficiently without facing unpredictable compliance costs.

bp appreciates Ecology’s thorough public process to evaluate this important decision and encourages consideration of Washington’s environment and economy.

Please reach out if you have any questions via [james.verburg@bp.com](mailto:james.verburg@bp.com).

Sincerely,

A handwritten signature in black ink, appearing to read "James Verburg". The signature is fluid and cursive, with the first name "James" and last name "Verburg" clearly distinguishable.

**James Verburg**

**Regulatory Advisor; Biofuels Value Chain**

cc: [mark.bunch@bp.com](mailto:mark.bunch@bp.com), [thomas.wolf@bp.com](mailto:thomas.wolf@bp.com), [katharyn.cordero@bp.com](mailto:katharyn.cordero@bp.com)